

**IN THE UNITED STATES BANKRUPTCY COURT FOR
THE DISTRICT OF DELAWARE**

In re:)	Chapter 11
)	
BIG LOTS, INC., et al. ¹ ,)	Case No. 24-11967 (JKS)
)	
Debtors.)	(Jointly Administered)
)	
)	

**CASITAS OCEANSIDE THREE LP’S JOINDER AND LIMITED OBJECTION TO
NOTICE OF LIST OF ADDITIONAL CLOSING STORES PURSUANT TO THE
INTERIM ORDER (I) AUTHORIZING DEBTORS TO ASSUME THE CONSULTING
AGREEMENT, (II) AUTHORIZING STORE CLOSING SALES AND APPROVING
RELATED PROCEDURES, AND (III) GRANTING RELATED RELIEF [D.I. 239]**

NOW COMES Landlord Casitas Oceanside Three LP (“Casitas” or “Landlord”), by and through his undersigned counsel, and hereby objects to the *Notice of List of Additional Closing Stores Pursuant to the Interim Order (I) Authorizing Debtors to Assume the Consulting Agreement, (II) Authorizing Store Closing Sales and Approving Related Procedures, and (III) Granting Related Relief* (D.I. 239) (the “Additional Store Closing Notice”), and therefore also to *Debtors’ Sale Motion* (DE 18) and *Debtors’ Motion to Reject Leases* (DE 17) (filed by Big Lots, Inc. and each of its subsidiaries (collectively, the “Debtors”) in the above-captioned jointly administered chapter 11 bankruptcy cases (the “Chapter 11 Cases”), and respectfully represents as follows:

¹ The debtors and debtors in possession in these chapter 11 cases, along with the last four digits of their respective employer identification numbers, are as follows: Great Basin, LLC (6158); Big Lots, Inc. (9097); Big Lots Management, LLC (7948); Consolidated Property Holdings, LLC (0984); Broyhill LLC (7868); Big Lots Stores - PNS, LLC (5262); Big Lots Stores, LLC (6811); BLBO Tenant, LLC (0552); Big Lots Stores - CSR, LLC (6182); CSC Distribution LLC (8785); Closeout Distribution, LLC (0309); Durant DC, LLC (2033); AVDC, LLC (3400); GAFDC LLC (8673); PAFDC LLC (2377); WAFDC, LLC (6163); INFDC, LLC (2820); Big Lots eCommerce LLC (9612); and Big Lots F&S, LLC (3277). The address of the debtors’ corporate headquarters is 4900 E. Dublin Granville Road, Columbus, OH 43081.

JOINDER

1. Casitas respectfully joins in the following Objections: *NORTHTOWNE PLAZA PROPERTIES, LTD.'S LIMITED OBJECTION TO THE NOTICE OF LIST OF ADDITIONAL CLOSING STORES PURSUANT TO THE INTERIM ORDER (I) AUTHORIZING DEBTORS TO ASSUME THE CONSULTING AGREEMENT, (II) AUTHORIZING STORE CLOSING SALES AND APPROVING RELATED PROCEDURES, AND (III) GRANTING RELATED RELIEF [D.I. 239] (DE 274), LEASE SALE AND ADEQUATE ASSURANCE OBJECTION OF PARKRIDGE MAIN, LLC RELATING TO DEBTOR'S STORE LOCATED AT PARKRIDGE MAIN SHOPPING CENTER IN CORONA CA (DE 277), and LEASE SALE AND ADEQUATE ASSURANCE OBJECTION OF GRATIOT, LLC RELATING TO DEBTOR'S STORE LOCATED AT GRATIOT SHOPPING CENTER IN CHESTERFIELD MI (DE 278)*, and hereby adopts the objections, authorities and arguments therein, to the extent not inconsistent with the positions of Casitas.

LEASE

2. Landlord is the Owner and Lessor of the lease and premises to Debtors at 1702 Oceanside Boulevard, Oceanside, CA 92054, The lease is identified as Store #4676, item 33, on Exhibit 1, Initial Leases, to the Debtors' Motion to Reject Unexpired Leases, filed 9/9/24, (DE 17).

JOINDER AND RESERVATION OF RIGHTS

3. Landlord also joins in any other Objections filed by any other landlords concerning Objections to Debtor's procedures regarding leases and to adequate assurance of future performance in the Notice. Landlord reserves the right to supplement this limited Objection where it may be necessary or appropriate.

CONCLUSION

WHEREFORE, Landlord respectfully request the Court (i) enter an order sustaining the objection and providing for adequate assurance for the Landlord; and (2) granting Landlord such other and further relief as the Court deems just and proper.

Dated: September 26, 2024

Respectfully submitted,

/s/Brian A. Sullivan

Brian A. Sullivan

(DE Bar No. Bar #2098)

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CERTIFICATE OF SERVICE

I, Brian A. Sullivan, certify that the foregoing pleading was served on September 26, 2024 by CM/ECF, upon the parties who have registered for CM/ECF service of notices and pleadings in this case and by email to the following:

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Dated: September 26, 2024

Respectfully submitted,

/s/Brian A. Sullivan

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